

Exhibit 2

Bruce Alan Rosenzweig, M.D.

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KERN

COLEEN M. PERRY,)	
)	
Plaintiff,)	
)	CASE NO.
-vs-)	S-1500-CV 279123 LHB
)	
HUNG T. LUU, M.D.;)	
JOHNSON & JOHNSON,)	
a New Jersey corporation;)	
ETHICON, INC.,)	
a New Jersey corporation;)	
and DOES 1-60,)	
)	
Defendants.)	

The deposition of BRUCE ALAN ROSENZWEIG, M.D., called by the Defendants for examination, taken before CORINNE T. MARUT, C.S.R. No. 84-1968, a Notary Public within and for the County of DuPage, State of Illinois, and a Certified Shorthand Reporter of said state, at the offices of Wexler Wallace LLP, Suite 3300, 55 West Monroe Street, Chicago, Illinois, on December 15, 2014, commencing at 9:41 a.m.

Bruce Alan Rosenzweig, M.D.

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<p>1 MR. SNELL: Yes. What time is it?</p> <p>2 MR. CARTMELL: It's 3:00 basically.</p> <p>3 MR. SNELL: Okay.</p> <p>4 (WHEREUPON, a recess was had</p> <p>5 from 2:55 to 3:23 p.m.)</p> <p>6 BY MR. SNELL:</p> <p>7 Q. With regard to the Clavé paper, do you</p> <p>8 know what methodology was used to determine which</p> <p>9 of the 100 explants would ultimately be selected</p> <p>10 for chemical analysis?</p> <p>11 A. I don't think that's described in the</p> <p>12 paper.</p> <p>13 Q. Have you ever used a laser-cut mesh for</p> <p>14 stress urinary incontinence treatment?</p> <p>15 A. No.</p> <p>16 Q. Have you ever used a laser-cut mesh for</p> <p>17 pelvic organ prolapse treatment?</p> <p>18 A. Not that I'm aware of.</p> <p>19 Q. In your opinion which is better,</p> <p>20 laser-cut mesh or mechanical-cut mesh?</p> <p>21 A. Well, both have problems. We know that</p> <p>22 mechanical-cut mesh frays, has particle loss, ropes</p> <p>23 and curls. Laser-cut mesh is stiffer.</p> <p>24 Mechanical-cut mesh -- or laser-cut mesh</p> <p>25 was made, as a -- as Dr. Kammerer said in his</p>	<p>1 MR. SNELL: I don't think he said yes.</p> <p>2 MR. CARTMELL: Yes, he did.</p> <p>3 BY MR. SNELL:</p> <p>4 Q. This is the simple question. In your</p> <p>5 opinion both mechanically-cut mesh and laser-cut</p> <p>6 mesh are defective? Yes or no.</p> <p>7 A. Yes, for the reasons I described.</p> <p>8 Q. So, if Dr. Luu would have opted to use a</p> <p>9 mechanically-cut mesh you would have criticized</p> <p>10 that mesh, correct?</p> <p>11 A. Well, Dr. Luu found in his experience a</p> <p>12 10% erosion rate associated with the Abbrevio slings</p> <p>13 that he used. So, in his series he had a fairly</p> <p>14 significant erosion rate.</p> <p>15 MR. SNELL: Move to --</p> <p>16 BY THE WITNESS:</p> <p>17 A. Now --</p> <p>18 MR. SNELL: Move to strike. Non-responsive.</p> <p>19 BY MR. SNELL:</p> <p>20 Q. My question was straightforward. If</p> <p>21 Dr. Luu would have used a mechanically-cut mesh you</p> <p>22 would have still criticized that mesh, correct?</p> <p>23 A. If it was an Abbrevio?</p> <p>24 Q. If it was --</p> <p>25 A. Mechanical-cut Abbrevio?</p>
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<p>1 deposition, to save costs and not to fix any</p> <p>2 perceived problem. And so both of them have</p> <p>3 problems associated with them.</p> <p>4 Q. So, you believe that both mechanical-cut</p> <p>5 mesh and laser-cut mesh are defective?</p> <p>6 A. Mechanical-cut mesh ropes, curls, frays.</p> <p>7 Once you stretch it to a greater than 10 to 15%</p> <p>8 elongation, it can undergo permanent elongation.</p> <p>9 You can lose pore size.</p> <p>10 Laser-cut mesh is stiff and therefore</p> <p>11 you get the properties of stress shielding which</p> <p>12 increases erosion, incontinence and pain.</p> <p>13 MR. SNELL: Move to strike non-responsive.</p> <p>14 BY MR. SNELL:</p> <p>15 Q. It's your opinion that both</p> <p>16 mechanically-cut mesh and laser-cut mesh are</p> <p>17 defective, correct?</p> <p>18 MR. CARTMELL: Object; asked and answered.</p> <p>19 BY THE WITNESS:</p> <p>20 A. I've described the problems associated</p> <p>21 with both of them.</p> <p>22 BY MR. SNELL:</p> <p>23 Q. And my question is --</p> <p>24 MR. SNELL: Move to strike again.</p> <p>25 MR. CARTMELL: He just said yes.</p>	<p>1 Q. Or any type of mechanically cut stress</p> <p>2 incontinence sling.</p> <p>3 A. It has problems with roping, curling and</p> <p>4 fraying.</p> <p>5 Q. So, the answer is yes?</p> <p>6 A. To -- if it was a mechanical-cut mesh,</p> <p>7 yes.</p> <p>8 Q. You mentioned the earlier TVT Secur</p> <p>9 versus TVT-O study and the difference in the</p> <p>10 exposure rate?</p> <p>11 A. That is correct.</p> <p>12 Q. What are the factors that could affect</p> <p>13 that exposure rate seen in that study besides the</p> <p>14 laser-cut mesh?</p> <p>15 A. In what respect?</p> <p>16 Q. In any respect.</p> <p>17 MR. CARTMELL: Do you have the study?</p> <p>18 MR. SNELL: He's the one who raised it. If</p> <p>19 you have it.</p> <p>20 MR. CARTMELL: No, he told you what the</p> <p>21 exposure rate is. Now you've asked him to go to</p> <p>22 the study and look at the data and what factors</p> <p>23 could have influenced --</p> <p>24 MR. SNELL: No.</p> <p>25 MR. CARTMELL: -- the exposure rate. Produce</p>

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